

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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MICHELLE CAICEDO SOTO, on her own behalf and
on behalf of others similarly situated,

Plaintiff,

-against-

MISS LASER INC. d/b/a Miss Laser, FRIDA
KOYUNOV, EMANUEL ARABOV, and JOSEF
YUNAEV,

Defendants.

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Case No.: 1:19-cv-4745 (MKB) (CLP)

NOTICE OF MOTION

Oral Argument Requested

PLEASE TAKE NOTICE, that pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, the Memorandum of Law in Support, the Declaration of Emanuel Kataev, and all the papers and pleadings in this case, Defendants will move this Court before the Hon. Hector Gonzalez, U.S.D.J. (“Judge Gonzalez”), on a date and time to be determined by the Court, for an Order: (i) dismissing the complaint for failure to state a claim upon which relief can be granted; and (ii) for such other and further relief as the Court deems just, equitable, and proper.

PLEASE TAKE FURTHER NOTICE, that pursuant to the June 10, 2022 Order of Judge Gonzalez, opposition papers must be served on July 15, 2022, and reply papers must be served on July 22, 2022.

Dated: Lake Success, New York
June 24, 2022

Respectfully submitted,
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